

knowingly and intentionally combined, conspired, confederated and agreed together, and with other persons known and unknown to the Grand Jury, to commit the following offenses against the United States:

1. To unlawfully, knowingly and intentionally manufacture and attempt to manufacture Methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846; and
2. To unlawfully, knowingly and intentionally possess with the intent to distribute Methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

OBJECT OF THE CONSPIRACY

The object and purpose of this conspiracy was for **LANNY GEORGE, TONI GORDON, CODY CROWE, JONATHAN LAMBERT, TAMMY SIMS** and **JUSTIN AYERS** to obtain the necessary ingredients and equipment necessary to manufacture Methamphetamine and to supply **MATTHEW GRACE** with the necessary ingredients and equipment to manufacture Methamphetamine. It was further part of the conspiracy for **MATTHEW GRACE, LANNY GEORGE, TONI GORDON, CODY CROWE, JONATHAN LAMBERT, TAMMY SIMS** and **JUSTIN AYERS** to supply users with the illicit and illegally manufactured Methamphetamine and to collect the proceeds of the distribution of the Methamphetamine for the financial benefit and use of the co-conspirators. All in violation of Title 21, United States Code, Section 846.

COUNT 2

On or about January 21, 2009, in the Western District of Tennessee, the defendants,

-----MATTHEW GRACE-----
-----LANNY GEORGE-----
-----TONI GORDON-----
-----CODY CROWE-----
-----JONATHAN LAMBERT-----
-----TAMMY SIMS-----
-----and-----
-----JUSTIN AYERS-----

each aided and abetted by the other, did unlawfully, knowingly and intentionally attempt to manufacture a mixture and substance containing a detectable amount of Methamphetamine, a controlled substance as classified by Title 21, United States Code, Section 812 as a Schedule II controlled substance in violation of Title 21, United States Code, Sections 841(a)(1), 846 and Title 18, United States Code, Section 2.

COUNT 3

On or about January 21, 2009, in the Western District of Tennessee, the defendants,

-----MATTHEW GRACE-----
-----CODY CROWE-----
-----JONATHAN LAMBERT-----
-----TAMMY SIMS-----
-----and-----
-----JUSTIN AYERS-----

each aided and abetted by the other, did unlawfully, knowingly and intentionally possess equipment, chemicals, products, and materials which may be used to manufacture Methamphetamine, a controlled substance as classified by Title 21, United States Code, Section 812 as a Schedule II controlled substance, knowing, intending, and having reasonable cause to believe that said equipment, chemicals, products and materials would be used to manufacture Methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(a)(6), and Title 18, United States Code, Section 2.

COUNT 4

On or about January 21, 2009, in the Western District of Tennessee, the defendants,

-----MATTHEW GRACE-----
-----CODY CROWE-----
-----JONATHAN LAMBERT-----
-----TAMMY SIMS-----
-----and-----
-----JUSTIN AYERS-----

each aided and abetted by the other, did unlawfully, knowingly and intentionally possess pseudoephedrine, a listed chemical as defined in Title 21, United States Code, Section 802, with the intent to manufacture Methamphetamine, a controlled substance as classified by Title 21, United States Code, Section 812 as a Schedule II controlled substance, and knowing and having reasonable cause to believe that said listed chemical would be used to manufacture Methamphetamine in a manner other than authorized by Title 21, United States Code, Sections 801 through 904, in violation of Title 21, United States Code, Section 841(c) and Title 18, United States Code, Section 2.

COUNT 5

Beginning at a time unknown to the grand jury, but through at least January 21, 2009, in the Western District of Tennessee, the defendant,

-----**MATTHEW GRACE**-----

did unlawfully, knowingly and intentionally employ, hire, use and persuade a person under eighteen years of age to possess with the intent to distribute and to distribute Methamphetamine, as classified by Title 21, United States Code, Section 812 as a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). All in violation of Title 21, United States Code, Section 861(a)(1).

COUNT 6

On or about January 21, 2009, in the Western District of Tennessee, the defendant,

-----**MATTHEW GRACE**-----

did unlawfully, knowingly and intentionally use and maintain a building, specifically located in the vicinity of 24 Fly Road in Humboldt, Tennessee, and made available for use said building for the purpose of unlawfully manufacturing and using a controlled substance, more specifically Methamphetamine, a controlled substance as classified

by Title 21, United States Code, Section 812 as a Schedule II controlled substance, in violation of Title 21, United States Code, Section 856.

A TRUE BILL:


FOREPERSON

4-20-09
DATE


UNITED STATES ATTORNEY